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Incorporated and Sustaining Technologies, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

Kelley Rajala,

Plaintiff,

vs.

Sonoma County Go Local Cooperative,
Incorporated, Et Al.,

Defendants

Sonoma County Go Local Cooperative,
Incorporated and Sustaining Technologies,
LLC,

Counterclaimants,

vs.

Rajala, Kelley, an individual, and
Local Works, Flexible Purpose Corporation,
A California Corporation,

Counterclaim Defendants.

Case No.: 15-CV-00442-JST

**JOINT STIPULATION TO
EXTEND DEADLINE TO FILE
DISPOSITIVE MOTIONS
~~[PROPOSED]~~ ORDER**

Honorable Jon S. Tigar

JOINT STIP. TO EXTEND DEADLINE TO FILE DISPOSITIVE MOTIONS

Case. No. 15-CV-442-JST

1 Defendants/Counterclaimants, Sonoma County Go Local Cooperative,
2 Incorporated and Sustaining Technologies, LLC, and Plaintiffs/Counterclaim
3 Defendants, Kelley Rajala and Local Works, Flexible Purpose Corporation, by and
4 through their respective counsel, jointly request that the Court grant a three-week
5 extension of time by which the parties must file dispositive motions. Should the
6 Court grant this request, the deadline to file dispositive motions would be moved
7 from its current date of June 10, 2016, to July 1, 2016. The grounds for this request
8 are as follows:

9 1. Pursuant to Court order, the parties engaged in an early neutral
10 evaluation on April 29, 2016, before evaluator Daralyn Durie of Durie Tangri
11 Lemley Roberts & Kent, in San Francisco.

12 2. The ENE process led to an agreement to settle the dispute, and a term
13 sheet was executed by both parties setting out the material terms of the agreement.

14 3. The Term Sheet recites that the agreement will be memorialized in a
15 final settlement agreement, and that any disputes regarding the finalization of the
16 agreement will be submitted to Daralyn Durie for resolution via binding
17 arbitration.

18 4. Since the date of the ENE, the parties, through counsel, have engaged
19 (and continue to engage) in a good faith effort to conclude a final settlement
20 agreement. However, there remain a few provisions over which the parties have
21 yet to agree.

22 5. Should the parties be unable to finalize the settlement agreement
23 before June 10, 2016, the parties will cooperate in scheduling a binding arbitration
24 with Ms. Durie at a time convenient for all parties and counsel.

25 6. Accordingly, for the reasons set forth above, the parties agree that in
26 the interests of fairness, in the interests of resolving the matter without further need
27 of court or neutral evaluator intervention, to preserve the parties' respective rights
28

1 to file dispositive motions should the need continue to exist, the parties respectfully
2 request that the Court grant a three-week extension of time to file dispositive
3 motions in this case.

4 7. No other dates in the current schedule under the Amended Scheduling
5 Order [Dkt 54], including dates for filing pre-trial briefs and motions, or trial, need
6 be disturbed.

7 Respectfully Submitted,

8
9 Dated: May 27, 2016

STAINBROOK & STAINBROOK, LLP

10 By: /s/ Craig M. Stainbrook

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12 Craig M. Stainbrook
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13 *Attorneys for Defendants/Counterclaimants*
14 Sonoma County Go Local Cooperative,
15 Incorporated and Sustaining Technologies,
16 LLC

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18 Dated: May 27, 2016

ONE LLP

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20 By: /s/ Joanna Ardalan

21
22 Joanna Ardalan
jardalan@onellp.com

23 *Attorneys for Plaintiff/Counterdefendants*
24 Kelley Rajala and Local Works, Flexible
25 Purpose Corporation
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ORDER

PURSUANT TO STIPULATION, AND GOOD CAUSE HAVING BEEN SHOWN, IT IS ORDERED that the deadline for filing dispositive motions is extended to July 1, 2016.

Dated: June 7, 2016

